

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN  
ELECTRIC COMPANY, LLC, EUROENERGY  
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL  
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY  
LLC, GREGORY MERLE, RIVERVIEW ENERGY  
CORPORATION, DANIEL ESCANDON GARCIA,  
RAMON URIARTE INCHAUSTI, CHIPPER  
INVESTMENT SCR, SA, URINCHA SL, THEODORE  
JOHN HANSEN, BRIAN R. MIKKELSON, and  
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. 1:20-cv-03746 (LJL)

**NOTICE OF MOTION FOR INJUNCTIVE AND OTHER INTERIM RELIEF**

PLEASE TAKE NOTICE, that upon the memorandum of law in support of its motion for injunctive and other interim relief, dated August 25, 2020, and the accompanying Declarations of Dov Gold, Camilo Patrignani, Phaedra Chrousos, and Aaron S. Weiss, Plaintiffs Convergen Energy LLC, L'Anse Warden Electric Company, LLC, Euroenergy Biogas Latvia Limited, and Libra Capital US, Inc. will move this court, before the honorable Judge Lewis J. Liman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007 on a date and at a time set by the Court, for an order pursuant to Rule 65 and Rule 37 of the Federal Rules of Civil Procedure or in the alternative 18 U.S. C § 1836(b)(3)(A).

Dated: August 25, 2020  
New York, New York

SEIDEN LAW GROUP, LLP

By: /s/ Michael Stolper

Michael Stolper

Dov Byron Gold

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*Counsel for Plaintiffs*